

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13  
Yongping Wang :  
Debtor : BANKRUPTCY NO.: 19-16681-jkf

**RESPONSE TO MOTION FOR RELIEF**

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Denied. Movant refers to documents on record before the Court. Said documents speak for themselves. The Debtor does not attest to the veracity of said documents, and therefore the averments referencing said documents in the corresponding paragraph are denied.
4. Denied. Movant's averment assumes facts not on record before the Court. Debtor demands strict proof of any delinquency. To the extent Movant's averment is a conclusion of law, said averment is denied.
5. Denied. The Debtor is without requisite knowledge to attest the veracity of Movant's averment.
6. Admitted in part, Denied in part. The Debtor is without requisite knowledge to attest to the veracity of Movant's premise, that mortgage foreclosure proceedings were to be instituted. The Debtor admits that the filing of a bankruptcy operated as a stay against any such actions.
7. The Debtor intends to cure any post-petition payments that may be due at this time.
8. Denied. After a reasonable and diligent inquiry, the debtor does not have the requisite knowledge to attest to the veracity of said allegations, and thus the averment is denied.
9. Neither admitted, nor denied. The Debtor defers to the Court's discretion.
10. Denied. Movant's averment is a conclusion of law to which no response is required. Said averment is therefore denied.
11. Denied. The Debtor is without requisite knowledge to attest the veracity of Movant's averment. By way of further response, Debtor has no objections to the

Movant complying with § 7(b) of the Chapter 13 Plan, titled: “Affirmative duties on holders of claims secured by a security interest in debtor's principal residence.”

12. Denied. To the extent Movant’s averment is a conclusion of law, said averment is denied as no response is required. To the extent movant’s averment contains factual allegations, after a reasonable and diligent inquiry, the debtor does not have the requisite knowledge to attest to the veracity of said allegations, and thus the averment is denied.

WHEREFORE, Debtor pray that the Movant’s request for relief be denied.

Date: April 1, 2020

/s/ Brandon J. Perloff  
Brandon J. Perloff Esquire.  
1429 Walnut Street, Ste 701  
Philadelphia, PA 19102  
bperloff@kmfirm.com  
267-457-5570